

Ilan D. Scharf  
Jeffrey P. Nolan (Admitted pro hac vice)  
PACHULSKI STANG ZIEHL & JONES LLP  
780 Third Avenue, 34<sup>th</sup> Floor  
New York, New York 10017-2024  
Telephone: (212) 561-7700  
Facsimile: (212) 561-7777  
ischarf@pszjlaw.com  
jnolan@pszjlaw.com

*Counsel for the Plaintiff,*  
*Howard M. Ehrenberg in his capacity*  
*as Liquidating Trustee of Orion Healthcorp, Inc., et al.,*

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

In re:	:	Chapter 11
ORION HEALTHCORP, INC <sup>1</sup> .	:	Case No. 8-18-71748 (AST)
Debtors.	:	(Jointly Administered)
HOWARD M. EHRENBERG IN HIS CAPACITY AS LIQUIDATING TRUSTEE OF ORION HEALTHCORP, INC., ET AL.,	:	Adv. Pro. No. 8-20-08039 (AST)
Plaintiff,	:	
v.	:	
MOSHE FEUER; MIRIAM FEUER; BANK OF AMERICA CORPORATION D/B/A MERRILL LYNCH,	:	
Defendant(s)	:	

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Orion Healthcorp, Inc. (7246); Constellation Healthcare Technologies, Inc. (0135); NEMS Acquisition, LLC (7378); Northeast Medical Solutions, LLC (2703); NEMS West Virginia, LLC (unknown); Physicians Practice Plus Holdings, LLC (6100); Physicians Practice Plus, LLC (4122); Medical Billing Services, Inc. (2971); Rand Medical Billing, Inc. (7887); RMI Physician Services Corporation (7239); Western Skies Practice Management, Inc. (1904); Integrated Physician Solutions, Inc. (0543); NYNM Acquisition, LLC (unknown) Northstar FHA, LLC (unknown); Northstar First Health, LLC (unknown); Vachette Business Services, Ltd. (4672); Phoenix Health, LLC (0856); MDRX Medical Billing, LLC (5410); VEGA Medical Professionals, LLC (1055); Allegiance Consulting Associates, LLC (7291); Allegiance Billing & Consulting, LLC (7141); New York Network Management, LLC (7168). The corporate headquarters and the mailing address for the Debtors listed above is 1715 Route 35 North, Suite 303, Middletown, NJ 07748.

**STIPULATION FOR EXTENSION OF DEFENDANTS  
MOSHE FEUER AND MIRIAM FEUERS TIME TO  
ANSWER THE COMPLAINT**

Plaintiff and Defendants, Moshe Feuer and Miriam Feuer, each by and through their respective undersigned attorney, hereby stipulate and agree to extend the time for Defendant to file an answer to Plaintiff's complaint as provided for herein:

1. On March 12, 2020, Plaintiff filed a complaint [Dkt. No. 1] against Defendant Moshe Feuer and Miriam Feuer.
2. The Summons [Dkt. No. 2] was issued by the Clerk's Office on March 13, 2020.
3. On March 13, 2020, Defendant was served with the summons and complaint. Defendant does not challenge personal jurisdiction and waives any objection to service of process in this adversary proceeding.
4. Defendant does not waive any other defenses, objections or challenges which it may bring in this action other than as expressly stated in the previous paragraph
5. On April 13, 2020, the parties entered the *Stipulation for Extension of Defendants Moshe Feuer and Miriam Feuer's Time to Answer the Complaint* [Dkt. No. 3], which extended the Feuers' deadline to answer the Complaint through and including May 13, 2020, subject to further extension.
6. On May 13, 2020, the parties entered the Stipulation for Extension of Defendants Moshe Feuer and Miriam Feuer's Time to Answer the Complaint [Dkt. No. 5], which extended the Feuer's deadline to answer the Complaint through and including June 30, 2020, subject to further extension.

7. On June 30, 2020, the parties entered the Stipulation for Extension of Defendants Moshe Feuer and Miriam Feuer's Time to Answer the Complaint [Dkt. No. 7], which extended the Feuer's deadline to answer the Complaint through and including July 30, 2020, subject to further extension.

8. The parties in good faith have exchanged certain documents, settlement positions, as well as exchanged a number of settlement offers. The most recent settlement offer was exchanged on August 28, 2020. Given the size of the matter, any settlement is subject to review and approval by the Oversight Committee. The parties desire to continue the settlement discussions but are impinging on a number of deadlines including the Pre-trial Conference set for September 21, 2020. The Parties seek a further extension to allow them time to complete these informal settlement discussions as well as to continue the Pre-trial Conference 30-60 days, and any applicable deadlines, or to a date convenient with the Court's calendar.

*[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]*

9. The extension is not sought for any improper purpose or to delay the proceeding.

**WHEREFORE**, the parties agree that the time by which Defendant is required to answer the Complaint is hereby extended through and including October 30, 2020.

Dated: September 4, 2020

Dated: September 4, 2020

**PACHULSKI STANG ZIEHL & JONES LLP**

Attorneys for Plaintiff Howard M.  
Ehrenberg in his capacity as Liquidating  
Trustee of Orion Healthcorp, Inc., et al

**McGuireWoods LLP**

Counsel for Defendant Moshe Feuer and  
Miriam Feuer

By: /s/ Jeffrey P. Nolan

Ilan D. Scharf, Esq.  
Jeffrey P. Nolan, Esq.  
780 Third Avenue, 34<sup>th</sup> Floor  
New York, NY 10017  
Tel: (212) 561-7700  
Email: [ischarf@pszjlaw.com](mailto:ischarf@pszjlaw.com)  
[jnolan@pszjlaw.com](mailto:jnolan@pszjlaw.com)

By: /s/ Shawn R. Fox

Shawn R. Fox  
1251 Avenue of the Americas  
20th Floor  
New York, NY 10020-1104  
Tel: (212) 548 2165  
Email: [sfox@mcguirewoods.com](mailto:sfox@mcguirewoods.com)

**SO ORDERED**